

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Clerk U.S. District Court
Southern District of Texas
FILED

NOV 19 2014

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs.

CRIMINAL NUMBER

JOHN ROBLEDO

AKA JOHN ROBLEDO JR.

AKA BERNARDO GUTIERREZ PEREZ

AKA SERGIO PELAYO-ROMERO

AKA FRANKIE ROBLEDO

REMIGIO VILLARREAL

AKA REMI

C - 14 - 852

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about May 1, 2011 and up to and including the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

JOHN ROBLEDO
AKA JOHN ROBLEDO JR.
AKA BERNARDO GUTIERREZ PEREZ
AKA SERGIO PELAYO-ROMERO
AKA FRANKIE ROBLEDO
and REMIGIO VILLARREAL
AKA REMI,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved more than one thousand (1,000) kilograms of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

Between on or about May 1, 2011 and up to and including the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

JOHN ROBLEDO
AKA JOHN ROBLEDO JR.
AKA BERNARDO GUTIERREZ PEREZ
AKA SERGIO PELAYO-ROMERO
AKA FRANKIE ROBLEDO
and REMIGIO VILLARREAL
AKA REMI,

did knowingly and intentionally conspire and agree together, with each other and with other persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, then well knowing that the financial transactions involved the proceeds of some form of unlawful activity, to wit: the distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, to wit: the distribution of controlled substances, and to avoid a transaction reporting requirement under State or Federal law.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (a)(1)(B)(ii), and (h).

NOTICE OF CRIMINAL FORFEITURE

I. (21 U.S.C. § 853(a))

Pursuant to Title 21, United States Code, Section 853(a), the United States of America gives notice to the defendants,

JOHN ROBLEDO
AKA JOHN ROBLEDO JR.
AKA BERNARDO GUTIERREZ PEREZ

AKA SERGIO PELAYO-ROMERO
AKA FRANKIE ROBLEDO
and REMIGIO VILLARREAL
AKA REMI,

that, upon conviction of the offense charged in Count One herein, the United States of America shall forfeit all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

The property to be forfeited includes, but is not limited to, the following:

- a. All funds on deposit in Bank of America account with the last four digits 4324 in the name of John Robledo Jr.;
- b. All funds on deposit in Bank of America account with the last four digits 7960 in the name of John Robledo Jr.;
- c. All funds on deposit in Wells Fargo Bank account with the last four digits 9997 in the name of John Robledo Jr.;
- d. All funds on deposit in Wells Fargo Bank account with the last four digits 8628 in the name of John Robledo Jr.;
- e. All funds on deposit in Wells Fargo Bank account with the last four digits 9880 in the name of Bernardo Gutierrez Perez; and
- f. Real property and improvements located at 3204 S. Bluebonnet Street, Pharr, Texas 78577, with a legal description of: Lot Twenty-Five (25), Star Subdivision, Hidalgo County, Texas, According to the map thereof recorded in the Map Records of Hidalgo County, Texas recorded in Volume 26, Page 94-B of the map records of the County Clerk of Hidalgo County, Texas.

II. (18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

JOHN ROBLEDO
AKA JOHN ROBLEDO JR.
AKA BERNARDO GUTIERREZ PEREZ

AKA SERGIO PELAYO-ROMERO
AKA FRANKIE ROBLEDO
and REMIGIO VILLARREAL
AKA REMI,

that, upon conviction of the offense charged in Count Two of the Indictment herein, the United States of America shall forfeit all property, real or personal, involved in such offense, or all property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- a. All funds on deposit in Bank of America account with the last four digits 4324 in the name of John Robledo Jr.;
- b. All funds on deposit in Bank of America account with the last four digits 7960 in the name of John Robledo Jr.;
- c. All funds on deposit in Wells Fargo Bank account with the last four digits 9997 in the name of John Robledo Jr.;
- d. All funds on deposit in Wells Fargo Bank account with the last four digits 8628 in the name of John Robledo Jr.;
- e. All funds on deposit in Wells Fargo Bank account with the last four digits 9880 in the name of Bernardo Gutierrez Perez; and
- f. Real property and improvements located at 3204 S. Bluebonnet Street, Pharr, Texas 78577, with a legal description of: Lot Twenty-Five (25), Star Subdivision, Hidalgo County, Texas, According to the map thereof recorded in the Map Records of Hidalgo County, Texas recorded in Volume 26, Page 94-B of the map records of the County Clerk of Hidalgo County, Texas.

III. Money Judgment

Defendants are notified that, upon conviction, the property subject to forfeiture includes, but is not limited to, a money judgment payable to the United States of America in an amount equal to the total value of the property subject to forfeiture for which the defendants may be jointly and severally liable. The amount of the money judgment for each count charged in the Indictment is estimated to be, but is not limited to, approximately \$500,000.00.

IV. Substitute Property

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or,
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to seek forfeiture of any substitute property of the defendants pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 18 U.S.C. Section 982(b)(1).

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By:



JULIE K. HAMPTON
Assistant United States Attorney